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Attorneys for Defendants  
SAMSUNG ELECTRONICS CO., LTD.  
and SAMSUNG SEMICONDUCTOR, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

EDGE ELECTRONICS, INC.

Plaintiff,

vs.

HYNIX SEMICONDUCTOR, INC.  
et al. (Case No. C06-01207 PJH)

Defendants.

Case No. C 07-01207 PJH  
Case No. C 07-01381 PJH

**STIPULATION AND ~~PROPOSED~~  
ORDER PROVIDING FOR  
DEPOSITION OF YOUNG HWAN  
PARK AFTER HIS RELEASE FROM  
PRISON IN JANUARY 2008**

DRAM CLAIMS LIQUIDATION  
TRUST, By Its TRUSTEE WELLS  
FARGO BANK, NA,

Plaintiff,

vs.

HYNIX SEMICONDUCTOR INC.,  
et al. (Case No. C07-01381 PJH)

Defendants.

1 WHEREAS, Plaintiffs Edge Electronics, Inc. and DRAM Claims  
2 Liquidation Trust ("Plaintiffs") have noticed the deposition of Young Hwan Park  
3 ("Mr. Park") at the Federal Correctional Complex in Lompoc, California to occur on  
4 a mutually agreeable date, pursuant to the Stipulated Order for Leave to Depose  
5 Prisoners Pursuant to Fed. R. Civ. P. 30(a), signed by this Court on October 26,  
6 2007;

7 WHEREAS, the current fact discovery cut-off in these cases is  
8 December 17, 2007;

9 WHEREAS, Mr. Park is scheduled to be released from prison in  
10 January 2008;

11 WHEREAS, the parties jointly agree that for the convenience of all  
12 parties and counsel, it would be better to conduct Mr. Park's deposition after his  
13 release from prison;

14 WHEREAS, Defendants Samsung Electronics Co., Ltd. and Samsung  
15 Semiconductor, Inc. (collectively, "Samsung") are willing to have Mr. Park's  
16 deposition taken after the December 17, 2007 fact discovery cut-off date;

17 WHEREAS, Plaintiffs have agreed to let Mr. Park return to Korea upon  
18 his release from prison and then return to the United States for his deposition;

19 WHEREAS, Samsung agrees to produce Mr. Park for his deposition in  
20 the United States at its expense as soon as reasonably practicable, given the  
21 necessity to obtain a visa, but in no event later than March 1, 2008;

22 WHEREAS, Plaintiffs agree that Samsung's agreement to conduct Mr.  
23 Park's deposition after the December 17, 2007 fact discovery cut-off date applies  
24 only to the deposition of Mr. Park and does not apply to any other deponents or  
25 discovery;

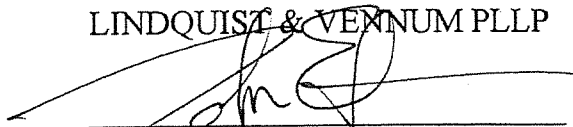
26 WHEREAS, Plaintiffs agree that Samsung's agreement to conduct Mr.  
27 Park's deposition after the December 17, 2007 fact discovery cut-off date will not be  
28

1 referenced by Plaintiffs in any application to extend the discovery cut-off date  
2 against Samsung or any other Defendant;

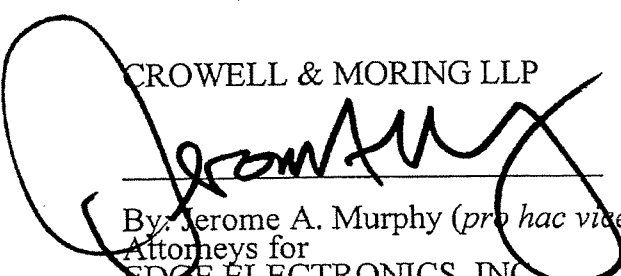
3 NOW THEREFORE, PLAINTIFFS AND SAMSUNG, THROUGH  
4 THEIR RESPECTIVE COUNSEL, HEREBY STIPULATE to the Court entering  
5 the attached Proposed Order.

6  
7 Stipulated by:

8  
9 LINDQUIST & VENNUM PLLP

10  
11   
12 By: John C. Ekman (*pro hac vice*)  
13 Attorneys for  
14 DRAM CLAIMS LIQUIDATION  
15 TRUST

16  
17 CROWELL & MORING LLP

18   
19 By: Jerome A. Murphy (*pro hac vice*)  
20 Attorneys for  
21 EDGE ELECTRONICS, INC.

22  
23 SHEPPARD MULLIN RICHTER &  
24 HAMPTON LLP

25 /s/ David R. Garcia

26  
27 By: David Garcia  
28 Attorneys for  
SAMSUNG ELECTRONICS CO,  
LTD. AND SAMSUNG  
SEMICONDUCTOR, INC.

[~~PROPOSED~~] ORDER

The Court hereby ORDERS:

1. The deposition of Y.H. Park may occur after the December 17, 2007 fact discovery cut-off date.

2. This order does not authorize the deposition of any individual other than Mr. Park or any other discovery after the December 17, 2007 fact discovery cut-off date.

3. Mr. Park may return to Korea after his release from prison on January 8, 2008 and will return for his deposition in the United States.

4. After Mr. Park's return to Korea, Samsung is ordered to produce Mr. Park for deposition in the United States at its expense as soon as reasonably practicable, given the necessity to obtain a visa, but in no event later than March 1, 2008.

5. Plaintiffs may not reference Samsung's agreement to conduct Mr. Park's deposition after the December 17, 2007 fact discovery cut-off date in any application to extend the discovery cut-off date against Samsung or any other Defendant

**IT IS SO ORDERED.**

Dated: 11/26/07

